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April 23, 2021

BY ECF

Hon. Loretta A. Preska
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 12A
New York, New York 10007-1312

Re: *Aurelius Capital Master, Ltd. v. The Republic of Argentina*,
No. 19 Civ. 351 (LAP) (S.D.N.Y.);

Adona LLC, Egoz I LLC, Egoz II LLC, Mastergen, LLC,
Erythrina, LLC, AP 2016 1, LLC, AP 2014 3A, LLC, AP 2014 2, LLC,
and WASO Holding Corp. v. The Republic of Argentina,
No. 19 Civ. 11338 (LAP) (S.D.N.Y.);

Novoriver S.A. v. Argentine Republic,
No. 19 Civ. 9786 (LAP) (S.D.N.Y.);

ACP Master, Ltd. v. The Republic of Argentina,
No. 19 Civ. 10109 (LAP) (S.D.N.Y.)

683 Capital Partners, LP v. The Republic of Argentina,
No. 19 Civ. 10131 (LAP) (S.D.N.Y.)

Dear Judge Preska:

We represent plaintiffs Aurelius Capital Master, Ltd. and ACP Master, Ltd., and we write on behalf of our clients and all the other plaintiffs—*i.e.*, Novoriver S.A.; 683 Capital Partners, LP; Adona LLC, Egoz I LLC, Egoz II LLC, Mastergen, LLC, Erythrina, LLC, AP 2016 1, LLC, AP 2014 3A, LLC, AP 2014 2, LLC, and WASO Holding Corp. (collectively, “Plaintiffs”)—in the above-referenced actions (the “Actions”), which the Court coordinated for pre-trial purposes, including discovery, in its Order of April 7, 2020 (19 Civ. 351, Dkt No. 30).

In accordance with the Court’s instruction in its Memorandum & Order, dated March 29, 2021 (19 Civ. 351, Dkt No. 39), Plaintiffs have met and conferred with defendant, the Republic of Argentina (the “Republic”), concerning a schedule for proceeding with

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discovery in the Actions. Subject to the Court's approval, Plaintiffs and the Republic have agreed upon the following schedule:

Parties to serve Rule 26(a) Initial Disclosures by:	May 24, 2021
Parties to serve initial Requests for Production by:	June 1, 2021
Parties to serve initial Interrogatories by:	June 1, 2021
Parties to complete document discovery by: ¹	December 15, 2021
<i>counsel shall appear for a conference on</i> Parties to complete fact witness depositions by:	12/7/21 at 9:30 March 31, 2022
Parties to serve Requests for Admission by:	March 31, 2022
Completion of fact discovery by:	April 29, 2022
Parties to designate expert witnesses and serve Rule 26(a)(2) disclosures by:	June 15, 2022
Parties to designate rebuttal experts and serve Rule 26(a)(2) disclosures by:	July 29, 2022
Parties to serve expert reply reports by:	August 31, 2022
Completion of expert discovery by:	September 30, 2022

The above deadlines shall apply, but may be extended by written consent of all parties without application to the Court, provided that (i) all fact discovery is completed by April 29, 2022, and (ii) expert discovery is completed by September 30, 2022. Subject to the above schedule, the parties will conduct discovery in accordance with the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York and Judge Preska's Individual Practices

We thank the Court for its consideration of these matters. If the parties' proposed schedule is acceptable to the Court, we have included a "So Ordered" signature line below for the Court's convenience. If Your Honor wishes to discuss these matters, the parties are available at the Court's convenience.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

4/26/21

Respectfully submitted,

Edward A. Friedman

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¹ Documents will be produced on a rolling basis.